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March 7, 2022

Via ECF

Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Buchanan et al. v. Darche
Case No. 21-cv-00660 (SHS)

Dear Judge Stein:

I am the Assistant Corporation Counsel in the Office of the Hon. Sylvia O. Hinds-Radix, Corporation Counsel for the City of New York, assigned to represent defendant Jonathan Darche (“defendant”) in the above-captioned action. I write jointly with plaintiffs’ counsel to respectfully request a 30-day extension of all remaining discovery deadlines, as follows:

- Last date for depositions: May 31, 2022
- Last date for fact discovery: June 27, 2022
- Last date for expert discovery: July 25, 2022

The parties engaged in a settlement conference on March 3, 2022 before Magistrate Judge Ona Wang. The parties made progress during the conference, and have scheduled a second settlement conference before Judge Wang for April 1, 2022. *See* Dkt. 48. In the meantime, the undersigned will be collecting information from the City to facilitate settlement discussions. In addition, counsel for the parties intend to resume settlement discussions prior to April 1. Accordingly, a 30-day extension of the discovery deadlines will enable the parties to adequately prepare for the upcoming settlement conference on April 1. This is the parties’ second request for an extension of discovery deadlines, and the first request was granted by Your Honor on January 18, 2022.

The parties thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Yuval Rubinstein
Assistant Corporation Counsel
Attorney for Defendant

/s/

Hope Pordy
Elizabeth Sprotzer
Attorneys for Plaintiffs